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Southern District of New York
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October 24, 2023

By ECF

Newly Assigned Judge¹
United States District Judge
Southern District of New York
40 Foley Square
New York, New York 10007

Re: *United States v. Virginia Lallave, S1 19 Cr. 15 (AJN)*

Dear Newly Assigned Judge:

I write on consent (Assistant U.S. Attorney Justin Rodriguez) to respectfully request that the Court permit Ms. Lallave to travel with her family to Nicaragua to bury her father, who died earlier this week. The Probation Office – per Officer Amber Wilton – takes no position on the request.

On July 3, 2019, Virginia Lallave pleaded guilty to violating 21 U.S.C. §§ 846 and 841(b)(1)(C). She was sentenced on November 4, 2019 to 42 months' imprisonment, to be followed by a three-year term of supervised release. *See Judgment, Dkt. No. 37.* Ms. Lallave completed the incarcerated portion of her sentence on October 14, 2022. Since her release, Ms. Lallave has been wholly compliant with all the conditions of her supervision.

Earlier this week, Ms. Lallave's father passed away after a long illness. The family – including Ms. Lallave's mother and sisters – are planning on bringing his body to Nicaragua for burial there.

I respectfully request that the Court modify the travel restrictions of supervised release to permit Ms. Lallave to travel with her family to Nicaragua. Ms. Lallave will provide her itinerary and contact information to the Probation Officer before she departs.

GRANTED.

¹ This case was originally before Honorable Alison J. Nathan. The clerk's office has instructed me to address this letter-motion to "Newly Assigned Judge," with the understanding that it will be reassigned once the motion is filed.

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Thank you for your consideration of this request.

Respectfully Submitted,

/s/

Martin S. Cohen
Ass't Federal Defender
(212) 417-8737

cc: Justin Rodriguez, Esq., by ECF
Amber Wilton, U.S. Probation Officer, by e-mail

SO ORDERED.



October 24, 2023

Alison J. Nathan, United States
Circuit Judge, Sitting by Designation